

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MARIA R. RAYGOZA, individually and on behalf of a class defined herein,	)	
	)	
Plaintiff,	)	Case No.: 08 CV 2891
	)	Judge Moran
v.	)	
	)	Magistrate Judge Schenkier
FIRST RESOLUTION INVESTMENT CORPORATION,	)	
	)	
Defendant.	)	

**AGREED MOTION FOR AN 18 DAY ENLARGEMENT OF TIME**

Defendant, First Resolution Investment Corporation ("First Resolution") by and through its attorneys, David M. Schultz and Corinne C. Heggie, pursuant to Rule 6 for its Agreed Motion for an 18 Day Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

1. On May 19, 2008, plaintiff filed a class action Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA").
2. On June 4, 2008, defendant moved for an agreed initial 21 day enlargement of time. Defendant's responsive pleading is due Monday, June 30, 2008.
3. Since the receiving this case, defense counsel has been diligently working with its client to obtain all the necessary information in its possession related to the allegations made in the complaint. The allegations involve claims under the FDCPA as well as two Illinois statutes, the Illinois Collection Agency Act ("ICAA") and the Consumer Fraud Act ("CFA") concerning a pleading filed in a state court collection case. At the time this motion is filed, defense counsel has not received all the information from the client to permit her to prepare a response to plaintiff's complaint.

4. Defense counsel will also be out of town from July 2, 2008 until July 6, 2008 for the Fourth of July holiday.

5. On June 25, 2008, defense counsel has discussed the additional time with counsel for the plaintiff. Counsel for the plaintiff has no objection to the relief sought herein.

6. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

WHEREFORE, Defendant, First Resolution Investment Corporation, respectfully, requests that this Court grant it an additional 18 days, up to and including July 18, 2008, to file its responsive pleading to plaintiff's Complaint.

Respectfully Submitted,

s/Corinne C. Heggie  
One of the attorneys for  
First Resolution Investment Corporation

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